



**DEPARTMENT OF ENVIRONMENTAL QUALITY**

KATHLEEN BABINEAUX BLANCO  
GOVERNOR

MIKE D. McDANIEL, Ph.D.  
SECRETARY

Certified Mail No.

Agency Interest No. 4384  
Activity No.: PER20070002

Ms. Carol Triebel  
Shell Chemical LP  
Post Office Box 10  
Norco, Louisiana 70079

RE: Part 70 operating permit renewal / modification, Norco Chemical Plant – West Site, Shell Chemical LP, Norco, St. Charles Parish, Louisiana

Dear Ms. Triebel:

This is to inform you that the permit renewal/modification for the above referenced facility has been approved under LAC 33:III.501. The permit is both a state preconstruction and Part 70 Operating Permit. The submittal was approved on the basis of the emissions reported and the approval in no way guarantees the design scheme presented will be capable of controlling the emissions as to the types and quantities stated. A new application must be submitted if the reported emissions are exceeded after operations begin. The synopsis, data sheets and conditions are attached herewith.

It will be considered a violation of the permit if all proposed control measures and/or equipment are not installed and properly operated and maintained as specified in the application.

Operation of this facility is hereby authorized under the terms and conditions of this permit. This authorization shall expire at midnight on the \_\_\_\_\_ of \_\_\_\_\_, 2012, unless a timely and complete renewal application has been submitted six months prior to expiration. Terms and conditions of this permit shall remain in effect until such time as the permitting authority takes final action on the application for permit renewal. The permit number and Agency Interest No. cited above should be referenced in future correspondence regarding this facility.

Done this \_\_\_\_\_ day of \_\_\_\_\_, 2007.

Permit No.: 2889-V1

Sincerely,

Chuck Carr Brown, Ph.D.  
Assistant Secretary  
CCB/DCN  
cc: EPA Region 6

**ENVIRONMENTAL SERVICES**  
: PO BOX 4313, BATON ROUGE, LA 70821-4313  
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**AIR PERMIT BRIEFING SHEET  
OFFICE OF ENVIRONMENTAL SERVICES  
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY**

**NORCO CHEMICAL PLANT – WEST SITE  
AGENCY INTEREST NO. 4384  
SHELL CHEMICAL LP  
NORCO, ST. CHARLES PARISH, LOUISIANA**

**I. Background**

The Norco Chemical Plant – West Site consists of the T Unit, the butylene storage spheres, West Site Shipping, and the recently shutdown M Unit. The T Unit currently operates under permit 2889-V0, dated August 31, 2004 while the butylene storage spheres, West Site Shipping, and the recently shutdown M Unit operates under Permit 2831-V0, dated March 21, 2003.

**II. Origin**

A permit application and Emission Inventory Questionnaire, dated April 12, 2007 as well as additional information dated August 10, 2007 and August 13, 2007 were submitted requesting a Part 70 operating permit renewal / modification.

**III. Description**

Wastewater from the Shell Norco Chemical Plant – East Site, Motiva Refinery, and other collocated companies (Hexion Specialty Chemicals Inc., Dow Chemical) are collected and introduced at various locations in the Effluent Biotreater System. The wastewaters are treated for solids removal, pH adjustment, clarification, and equalization before being sent to the aggressive biological treatment units, and then to final clarification (settling and filtering) prior to discharge to the Mississippi River. Recovered solids and wasted biomass are dewatered and sent to the biosolids incinerator for waste reduction.

The incinerator system consists of a multiple hearth incinerator, afterburner, eductor scrubber, induced draft fan, and stack. The 80.89 MM BTU/hr (vertical 8 hearth plus afterburner) natural gas fired combustor has approximately 2500 square feet of hearth area. Solids from the effluent biotreater system filters are conveyed by a Moyno pump to the incinerator feed chute. The feed chute deposits the solids on the periphery of the first (top) hearth where rabble arms with blades move the solids across the first hearth in a spiral path to the center where they fall through an opening to the second hearth. The rabble arm on the second hearth moves the solids outward to the periphery where they fall to the third hearth. Each hearth has a forced air natural gas fire burner that is controlled by hearth temperature.

The solids (ash) exit the eighth (bottom) hearth at approximately 900<sup>o</sup>F and are conveyed to storage and then sold as a product. The incinerator rabble arm shaft is air cooled by a 3800 scfm forced air blower. The shaft air is either vented to the atmosphere or returned to the incinerator between hearths 1&2, 2&3, 3&4, 5&6, or 7&8 for oxygen control.

Flue gases exit the incinerator at approximately 900<sup>o</sup>F and enter the afterburner chamber where a gas burner increases the temperature to 1500<sup>o</sup>F to ensure VOC destruction.

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Excess oxygen is maintained to minimize particulate and carbon monoxide formation during combustion. The flue gases from the afterburner are cooled in a pre-cooler (using clarified water) before entering the eductor scrubber for particulate and acids removal.

The T-Unit also includes a stripper which is used to remove ethylene dichloride and other contaminants from the recovered ground water. The stripped groundwater is pumped to the final effluent sump and then discharged to the river. Off-gas from the stripper is routed offsite for incineration.

Shell Chemical requests a Part 70 operating permit renewal/modification for the Norco Chemical Plant – West Site to include fugitive emissions from storage spheres and West Site Shipping (loading facilities for ships and barges) into this permit. Currently these operations, along with the M Unit, are covered by Permit 2831-V0. The M Unit was dismantled and Permit 2831-V0 will be rescinded. Vents from the spheres and the West Site loading activities are sent offsite for flaring. Permitted emissions in tons per year are as follows:

Pollutant	Permitted	Proposed	Change
PM <sub>10</sub>	23.45	21.65	- 1.80
SO <sub>2</sub>	9.95	10.23	+ 0.28
NO <sub>x</sub>	41.79	41.79	-
CO	32.74	33.69	+ 0.95
VOC, total	169.73	164.44	- 5.29

#### **IV. Type of Review**

This application was reviewed for compliance with the Louisiana Part 70 operating permit program and Louisiana Air Quality Regulations, NSPS, and NESHAP. PSD does not apply. The facility is a part of a major source of toxic air pollutants (TAPs) pursuant to LAC 33:III.Chapter 51.

#### **V. Credible Evidence**

Notwithstanding any other provisions of any applicable rule or regulation or requirement of this permit that state specific methods that may be used to assess compliance with applicable requirements, pursuant to 40 CFR Part 70 and EPA's Credible Evidence Rule, 62 Fed. Reg. 8314 (Feb. 24, 1997), any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed shall be considered for purposes of Title V compliance certifications. Furthermore, for purposes of establishing whether or not a person has violated or is in violation of any emissions

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limitation or standard or permit condition, nothing in this permit shall preclude the use, including the exclusive use, by any person of any such credible evidence or information.

**VI. Public Notice**

A notice requesting public comment on the proposed permit modification was published in *The Advocate*, (Baton Rouge, LA) and in the *XXX* (*XXX*, LA) on *XXX*, 2007. The notice was also mailed to individuals and organizations on the mailing list of the facility and published in the Office of Environmental Services Public Notice Mailing List on *XXX*, 2007. The proposed permit was submitted to United States Environmental Protection Agency (US EPA) Region 6. All comments will be considered prior to a permit decision.

**VII. Effects on Ambient Air**

Dispersion Model Used: ISC3

Pollutant	Averaging Period	Calculated Maximum Ground Level Concentration ( $\mu\text{g}/\text{m}^3$ )	Louisiana Air Quality Standard ( $\mu\text{g}/\text{m}^3$ )
Hydrochloric Acid	8-Hour	54.21	180
Chlorinated Dibenzo-P-Dioxins	Annual	(screen) < 0.000004	0.003
Chlorinated Dibenzofurans	Annual	(screen) < 0.000004	0.003
Hydrazine	Annual	0.007	0.02
1,3-Butadiene	Annual	0.61	0.92

**VIII. General Condition XVII Activities**

ID No.:	Description	VOC Emissions (tons/yr)
	Tank T-T206 Turnaround	< 0.01
	Tank T-T251 Turnaround	0.01
	Tank T-T6260 Turnaround	< 0.01

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**IX. Insignificant Activities - LAC 33:III.501.B.5**

ID No.:	Description	Capacity (gallons)	Citation
	Lube Oil Storage Tank A-T314	250	A.2
	Lube Oil Storage Tank A-T505	250	A.2
	Lube Oil Storage Tanks (east of T-T1101)	250	A.2
	Tote for Antifoam injection at T-T1101	200	A.2
	50% Urea Tank T-T307 (Biotreater Nutrient)	7000	A.3
	Diesel Tank V-T201	550	A.3
	Phosphoric Acid Tank T-T303 (Nutrient)	7000	A.3
	Water Treatment Chemical Storage, Flocculent T-T604	4000	A.3
	Control Room Lab Vent Hood	NA	A.6
	Analyzers and Samplings	NA	A.9

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X. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	LAC 33:III.							LAC 33:III.Chapter								
		2103	2107	2111	2113	2122	2121	2153	5 <sup>A</sup>	9	11	13	15	29	51*	56	59
ARE007	236-13 - Emissions from misc small wastewater sources																
EQT002	175 - Biosolids Incinerator (FT-701)									1		1					
EQT003	176 - Ash Silo and ash loading										1						
EQT004	236-1 - API receiver, effluent sumps, and connecting channels														1		
EQT005	236-2 - T-T202 Open														1		
EQT006	236-3 - pH Control Sumps (A-T210/11/12)														1		
EQT007	236-4 - Primary Clarifier (A-T213)														1		
EQT008	236-5 - T-T252 Open														1		
EQT009	236-6 - T-T251 IFR														1		
EQT010	236-7 - T-T351 Open														1		
EQT011	236-8 - T-T352 Open														1		
EQT012	187 - T-6260 FR														1		
EQT013	236-9 - Belt Press/Filter														1		
EQT014	236-10 - T-T504 Open														1		
EQT015	236-11 - T-T1101 Open														1		
EQT016	223 - Biotreater Effluent Backup Pump Diesel Engine (DP-T206)									1		1					
EQT017	236-14 - T-T206 FR														1		







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XI. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Status	Citation	Explanation
EQT002	LAC 33:III.1503.C. Emission Limitations - Sulfur Dioxide LAC 33:III.1511.A. Continuous Emissions Monitoring - Sulfur Dioxide 40 CFR 61.53(d) Annual mercury testing 40 CFR 64 - CAM	Exempt Exempt Waived	LAC 33:III.1503.C LAC 33:III.1511.A 40 CFR 61.13	SO <sub>2</sub> emissions < 250 tons/year SO <sub>2</sub> emissions < 100 tons/year Granted by EPA letter dated February 24, 1984
EQT016	LAC 33:III.1503.C. Emission Limitations - Sulfur Dioxide LAC 33:III.1511.A. Continuous Emissions Monitoring - Sulfur Dioxide 40 CFR 63, Subpart ZZZZ for IC Engines 40 CFR 60 Subpart IIII	Exempt Exempt Exempt Does not apply	40 CFR 64.2(b)(i) LAC 33:III.1503.C LAC 33:III.1511.A 40 CFR 63.6590.a	Subject to 40 CFR 60 Subpart DDDD SO <sub>2</sub> emissions < 250 tons/year SO <sub>2</sub> emissions < 100 tons/year Engine < 500 bhp
UNF003	40 CFR 63 Subpart GGGGG	Does not apply Exempt	40 CFR 60.4200(a)(3) 40 CFR 63.7881(c) or 63.7884(b)	No modification/reconstruction after July 11, 2005 HAP < 1.0 Mg or remediation activities < 30 days/year

The above table provides explanation for both the exemption status or non-applicability of a source cited by 2 or 3 in the matrix presented in Section X of this permit

#### 40 CFR PART 70 GENERAL CONDITIONS

- A. The term of this permit shall be five (5) years from date of issuance. An application for a renewal of this 40 CFR Part 70 permit shall be submitted to the administrative authority no later than six months prior to the permit expiration date. Should a complete permit application not be submitted six months prior to the permit expiration date, a facility's right to operate is terminated pursuant to 40 CFR Section 70.7(c)(ii). Operation may continue under the conditions of this permit during the period of the review of the application for renewal. [LAC 33:III.507.E.1, E.3, E.4, reference 40 CFR 70.6(a)(2)]
- B. The conditions of this permit are severable; and if any provision of this permit or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby. [Reference 40 CFR 70.6(a)(5)]
- C. Permittee shall comply with all conditions of the 40 CFR Part 70 permit. Any permit noncompliance constitutes a violation of the Clean Air Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [LAC 33:III.507.B.2, reference 40 CFR 70.6(a)(6)(i) & (iii)]
- D. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. [Reference 40 CFR 70.6(a)(6)(ii)]
- E. This permit does not convey any property rights of any sort, or an exclusive privilege. [Reference 40 CFR 70.6(a)(6)(iv)]
- F. The permittee shall furnish to the permitting authority, within a reasonable time, any information that the permitting authority may request in writing to determine whether cause exists for modifying, revoking, and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the permitting authority copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality. A claim of confidentiality does not relieve the permittee of the requirement to provide the information. [LAC 33:III.507.B.2, 517.F, reference 40 CFR 70.6(a)(6)(v)]
- G. Permittee shall pay fees in accordance with LAC 33:III.Chapter 2 and 40 CFR Section 70.6(a)(7). [LAC 33:III.501.C.2, reference 40 CFR 70.6(a)(7)]
- H. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the permitting authority or authorized representative to perform the following:
1. enter upon the permittee's premises where a 40 CFR Part 70 source is located or emission-related activity is conducted, or where records must be kept under the conditions of the permit [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(i)];
  2. have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(ii)];

#### 40 CFR PART 70 GENERAL CONDITIONS

3. inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(iii)]; and
  4. as authorized by the Clean Air Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(iv)]
- I. All required monitoring data and supporting information shall be kept available for inspection at the facility or alternate location approved by the agency for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Supporting information includes calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and all reports required by the permit. [Reference 40 CFR 70.6(a)(3)(ii)(B)]
- J. Records of required monitoring shall include the following:
1. the date, place as defined in the permit, and time of sampling or measurements;
  2. the date(s) analyses were performed;
  3. the company or entity that performed the analyses;
  4. the analytical techniques or methods used;
  5. the results of such analyses; and
  6. the operating conditions as existing at the time of sampling or measurement.
- [Reference 40 CFR 70.6(a)(3)(ii)(A)]
- K. Permittee shall submit at least semiannually, reports of any required monitoring, clearly identifying all instances of deviations from permitted monitoring requirements, certified by a responsible company official. For previously reported deviations, in lieu of attaching the individual deviation reports, the semiannual report may clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. The semiannual reports shall be submitted to the Office of Environmental Compliance, Enforcement Division by March 31 for the preceding period encompassing July through December and September 30 for the preceding period encompassing January through June. Any quarterly deviation report required to be submitted by March 31 or September 30 in accordance with Part 70 General Condition R may be consolidated with the semi-annual reports required by this general condition as long as the report clearly indicates this and all required information is included and clearly delineated in the consolidated report. [LAC 33:III.507.H, reference 40 CFR 70.6(a)(3)(iii)(A)]
- L. The permittee shall submit at least semiannual reports on the status of compliance pursuant to 40 CFR Section 70.5 (c) (8) and a progress report on any applicable schedule of compliance pursuant to 40 CFR Section 70.6 (c) (4). [LAC 33:III.507.H.1, reference 40 CFR 70.6(c)(4)]
- M. Compliance certifications per LAC 33:III.507.H.5 shall be submitted to the Administrator as well as the permitting authority. For previously reported compliance deviations, in lieu of attaching the individual deviation reports, the annual report may clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. The compliance certifications shall be submitted to the Office of Environmental Compliance, Enforcement Division by March 31 for the preceding calendar year.

## 40 CFR PART 70 GENERAL CONDITIONS

[LAC 33:III.507.H.5, reference 40 CFR 70.6(c)(5)(iv)]

- N. If the permittee seeks to reserve a claim of an affirmative defense as provided in LAC 33:III.507.J.2, the permittee shall, in addition to any emergency or upset provisions in any applicable regulation, notify the permitting authority within 2 working days of the time when emission limitations were exceeded due to the occurrence of an upset. In the event of an upset, as defined under LAC 33:III.507.J, which results in excess emissions, the permittee shall demonstrate through properly signed, contemporaneous operating logs, or other relevant evidence that: 1) an emergency occurred and the cause was identified; 2) the permitted facility was being operated properly at the time; and 3) during the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standard or requirement of the permit. [LAC 33:III.507.J.2, reference 40 CFR 70.6(g)(3)(iv) & (i-iii)]
- O. Permittee shall maintain emissions at a level less than or equal to that provided for under the allowances that the 40 CFR Part 70 source lawfully holds under Title IV of the Clean Air Act or the regulations promulgated thereunder. No permit revision shall be required for increases in emissions that are authorized by allowances acquired pursuant to the acid rain program, provided that such increases do not require a permit revision under any other applicable requirement. No limit shall be placed on the number of allowances held by the source. The source may not, however, use allowances as a defense to noncompliance with any other applicable requirement. Any such allowance shall be accounted for according to the procedures established in regulations promulgated under Title IV of the Clean Air Act. [Reference 40 CFR 70.6(a)(4)]
- P. Any permit issued pursuant to 40 CFR Part 70 may be subject to reopening prior to the expiration of the permit for any of the conditions specified in 40 CFR Section 70.7(f) or LAC 33:III.529. [LAC 33:III.529.A-B, reference 40 CFR 70.7(f)]
- Q. Permittee may request an administrative amendment to the permit to incorporate test results from compliance testing if the following criteria are met:
1. the changes are a result of tests performed upon start-up of newly constructed, installed, or modified equipment or operations;
  2. increases in permitted emissions will not exceed five tons per year for any regulated pollutant;
  3. increases in permitted emissions of Louisiana toxic air pollutants or of federal hazardous air pollutants would not constitute a modification under LAC 33:III. Chapter 51 or under Section 112 (g) of the Clean Air Act;
  4. changes in emissions would not require new source review for prevention of significant deterioration or nonattainment and would not trigger the applicability of any federally applicable requirement;
  5. changes in emissions would not qualify as a significant modification; and
  6. the request is submitted no later than 12 months after commencing operation. [LAC 33:III.523.A, reference 40 CFR 70.7(d)]

**40 CFR PART 70 GENERAL CONDITIONS**

- R. Permittee shall submit prompt reports of all permit deviations as specified below to the Office of Environmental Compliance, Enforcement Division. All such reports shall be certified by a responsible official in accordance with 40 CFR 70.5(d).
  - 1. A written report shall be submitted within 7 days of any emission in excess of permit requirements by an amount greater than the Reportable Quantity established for that pollutant in LAC 33.I.Chapter 39.
  - 2. A written report shall be submitted within 7 days of the initial occurrence of any emission in excess of permit requirements, regardless of the amount, where such emission occurs over a period of seven days or longer.
  - 3. A written report shall be submitted quarterly to address all permit deviations not included in paragraphs 1 or 2 above. Unless required by an applicable reporting requirement, a written report is not required during periods in which there is no deviation. The quarterly deviation reports submitted on March 31 and September 30 may be consolidated with the semi-annual reports required by Part 70 General Condition K as long as the report clearly indicates this and all required information is included and clearly delineated in the consolidated report. For previously reported permit deviations, in lieu of attaching the individual deviation reports, the quarterly report may clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. The schedule for submittal of quarterly reports shall be no later than the dates specified below for any permit deviations occurring during the corresponding specified calendar quarter:
    - a. Report by June 30 to cover January through March
    - b. Report by September 30 to cover April through June
    - c. Report by December 31 to cover July through September
    - d. Report by March 31 to cover October through December
  - 4. Any written report submitted in advance of the timeframes specified above, in accordance with an applicable regulation, may serve to meet the reporting requirements of this condition provided such reports are certified in accordance with 40 CFR 70.5(d) and contain all information relevant to the permit deviation. Reporting under this condition does not relieve the permittee from the reporting requirements of any applicable regulation, including LAC 33.I.Chapter 39, LAC 33.III.Chapter 9, and LAC 33.III.5107. [Reference 40 CFR 70.6(a)(3)(iii)(B)]
  
- S. Permittee shall continue to comply with applicable requirements on a timely basis, and will meet on a timely basis applicable requirements that become effective during the permit term. [Reference 40 CFR 70.5(c)(8)(iii)]
  
- T. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:
  - 1. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156;

#### 40 CFR PART 70 GENERAL CONDITIONS

2. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158;
3. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161;
4. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to 40 CFR 82.166. ("MVAC-like appliance" as defined at 40 CFR 82.152);
5. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR 82.156; and
6. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166. [Reference 40 CFR 82, Subpart F]

- U. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant. [Reference 40 CFR 82, Subpart B]

- V. Data availability for continuous monitoring or monitoring to collect data at specific intervals: Except for monitoring malfunctions, associated repairs, and required quality assurance or control activities (including calibration checks and required zero and span adjustments), the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the emissions unit is operating. For purposes of reporting monitoring deviations under Part 70 General Conditions K and R, and unless otherwise provided for in the Specific Requirements (or Table 3) of this permit, the minimum degree of data availability shall be at least 90% (based on a monthly average) of the operating time of the emissions unit or activity being monitored. This condition does not apply to Leak Detection and Repair (LDAR) programs for fugitive emissions (e.g., 40 CFR 60 Subpart VV, 40 CFR 63 Subpart H).

## LOUISIANA AIR EMISSION PERMIT GENERAL CONDITIONS

- I. This permit is issued on the basis of the emissions reported in the application for approval of emissions and in no way guarantees that the design scheme presented will be capable of controlling the emissions to the type and quantities stated. Failure to install, properly operate and/or maintain all proposed control measures and/or equipment as specified in the application and supplemental information shall be considered a violation of the permit and LAC 33:III.501. If the emissions are determined to be greater than those allowed by the permit (e.g. during the shakedown period for new or modified equipment) or if proposed control measures and/or equipment are not installed or do not perform according to design efficiency, an application to modify the permit must be submitted. All terms and conditions of this permit shall remain in effect unless and until revised by the permitting authority.
  
- II. The permittee is subject to all applicable provisions of the Louisiana Air Quality Regulations. Violation of the terms and conditions of the permit constitutes a violation of these regulations.
  
- III. The Emission Rates for Criteria Pollutants, Emission Rates for TAP/HAP & Other Pollutants, and Specific Requirements sections or, where included, Emission Inventory Questionnaire sheets establish the emission limitations and are a part of the permit. Any operating limitations are noted in the Specific Requirements or, where included, Tables 2 and 3 of the permit. The synopsis is based on the application and Emission Inventory Questionnaire dated April 12, 2007 as well as additional information dated August 10, 2007 and August 13, 2007.
  
- IV. This permit shall become invalid, for the sources not constructed, if:
  - A. Construction is not commenced, or binding agreements or contractual obligations to undertake a program of construction of the project are not entered into, within two (2) years (18 months for PSD permits) after issuance of this permit, or;
  - B. If construction is discontinued for a period of two (2) years (18 months for PSD permits) or more.

The administrative authority may extend this time period upon a satisfactory showing that an extension is justified.

This provision does not apply to the time period between construction of the approved phases of a phased construction project. However, each phase must commence construction within two (2) years (18 months for PSD permits) of its projected and approved commencement date.
  
- V. The permittee shall submit semiannual reports of progress outlining the status of construction, noting any design changes, modifications or alterations in the construction schedule which have or may have an effect on the emission rates or ambient air quality levels. These reports shall continue to be submitted until such time as construction is certified as being complete. Furthermore, for any significant change in the design, prior approval shall be obtained from the Office of Environmental Services, Air Permits Division.
  
- VI. The permittee shall notify the Department of Environmental Quality, Office of Environmental Services, Air Permits Division within ten (10) calendar days from the date that construction is certified as complete and the estimated date of start-up of operation. The appropriate Regional Office shall also be so notified within the same time frame.

**LOUISIANA AIR EMISSION PERMIT  
GENERAL CONDITIONS**

- VII. Any emissions testing performed for purposes of demonstrating compliance with the limitations set forth in paragraph III shall be conducted in accordance with the methods described in the Specific Conditions and, where included, Tables 1, 2, 3, 4, and 5 of this permit. Any deviation from or modification of the methods used for testing shall have prior approval from the Office of Environmental Assessment, Air Quality Assessment Division.
  
- VIII. The emission testing described in paragraph VII above, or established in the specific conditions of this permit, shall be conducted within sixty (60) days after achieving normal production rate or after the end of the shakedown period, but in no event later than 180 days after initial start-up (or restart-up after modification). The Office of Environmental Assessment, Air Quality Assessment Division shall be notified at least (30) days prior to testing and shall be given the opportunity to conduct a pretest meeting and observe the emission testing. The test results shall be submitted to the Air Quality Assessment Division within sixty (60) days after the complete testing. As required by LAC 33:III.913, the permittee shall provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of the emission limits.
  
- IX. The permittee shall, within 180 days after start-up and shakedown of each project or unit, report to the Office of Environmental Compliance, Enforcement Division any significant difference in operating emission rates as compared to those limitations specified in paragraph III. This report shall also include, but not be limited to, malfunctions and upsets. A permit modification shall be submitted, if necessary, as required in Condition I.
  
- X. The permittee shall retain records of all information resulting from monitoring activities and information indicating operating parameters as specified in the specific conditions of this permit for a minimum of at least five (5) years.
  
- XI. If for any reason the permittee does not comply with, or will not be able to comply with, the emission limitations specified in this permit, the permittee shall provide the Office of Environmental Compliance, Enforcement Division with a written report as specified below.
  - A. A written report shall be submitted within 7 days of any emission in excess of permit requirements by an amount greater than the Reportable Quantity established for that pollutant in LAC 33.I.Chapter 39.
  - B. A written report shall be submitted within 7 days of the initial occurrence of any emission in excess of permit requirements, regardless of the amount, where such emission occurs over a period of seven days or longer.
  - C. A written report shall be submitted quarterly to address all emission limitation exceedances not included in paragraphs A or B above. The schedule for submittal of quarterly reports shall be no later than the dates specified below for any emission limitation exceedances occurring during the corresponding specified calendar quarter:
    - 1. Report by June 30 to cover January through March
    - 2. Report by September 30 to cover April through June
    - 3. Report by December 31 to cover July through September
    - 4. Report by March 31 to cover October through December

**LOUISIANA AIR EMISSION PERMIT  
GENERAL CONDITIONS**

- D. Each report submitted in accordance with this condition shall contain the following information:
1. Description of noncomplying emission(s);
  2. Cause of noncompliance;
  3. Anticipated time the noncompliance is expected to continue, or if corrected, the duration of the period of noncompliance;
  4. Steps taken by the permittee to reduce and eliminate the noncomplying emissions; and
  5. Steps taken by the permittee to prevent recurrences of the noncomplying emissions.
- E. Any written report submitted in advance of the timeframes specified above, in accordance with an applicable regulation, may serve to meet the reporting requirements of this condition provided all information specified above is included. For Part 70 sources, reports submitted in accordance with Part 70 General Condition R shall serve to meet the requirements of this condition provided all specified information is included. Reporting under this condition does not relieve the permittee from the reporting requirements of any applicable regulation, including LAC 33.I.Chapter 39, LAC 33.III.Chapter 9, and LAC 33.III.5107.
- XII. Permittee shall allow the authorized officers and employees of the Department of Environmental Quality, at all reasonable times and upon presentation of identification, to:
- A. Enter upon the permittee's premises where regulated facilities are located, regulated activities are conducted or where records required under this permit are kept;
  - B. Have access to and copy any records that are required to be kept under the terms and conditions of this permit, the Louisiana Air Quality Regulations, or the Act;
  - C. Inspect any facilities, equipment (including monitoring methods and an operation and maintenance inspection), or operations regulated under this permit; and
  - D. Sample or monitor, for the purpose of assuring compliance with this permit or as otherwise authorized by the Act or regulations adopted thereunder, any substances or parameters at any location.
- XIII. If samples are taken under Section XII.D. above, the officer or employee obtaining such samples shall give the owner, operator or agent in charge a receipt describing the sample obtained. If requested prior to leaving the premises, a portion of each sample equal in volume or weight to the portion retained shall be given to the owner, operator or agent in charge. If an analysis is made of such samples, a copy of the analysis shall be furnished promptly to the owner, operator or agency in charge.
- XIV. The permittee shall allow authorized officers and employees of the Department of Environmental Quality, upon presentation of identification, to enter upon the permittee's premises to investigate potential or alleged violations of the Act or the rules and regulations adopted thereunder. In such investigations, the permittee shall be notified at the time entrance is requested of the nature of the suspected violation. Inspections under this subsection shall be

**LOUISIANA AIR EMISSION PERMIT  
GENERAL CONDITIONS**

limited to the aspects of alleged violations. However, this shall not in any way preclude prosecution of all violations found.

- XV. The permittee shall comply with the reporting requirements specified under LAC 33:III.919 as well as notification requirements specified under LAC 33:III.927.
- XVI. In the event of any change in ownership of the source described in this permit, the permittee and the succeeding owner shall notify the Office of Environmental Services, Air Permits Division, within ninety (90) days after the event, to amend this permit.
- XVII. Very small emissions to the air resulting from routine operations, that are predictable, expected, periodic, and quantifiable and that are submitted by the permitted facility and approved by the Air Permits Division are considered authorized discharges. Approved activities are noted in the General Condition XVII Activities List of this permit. To be approved as an authorized discharge, these very small releases must:
1. Generally be less than 5 TPY
  2. Be less than the minimum emission rate (MER)
  3. Be scheduled daily, weekly, monthly, etc., or
  4. Be necessary prior to plant startup or after shutdown [line or compressor pressuring/depressuring for example]

These releases are not included in the permit totals because they are small and will have an insignificant impact on air quality. This general condition does not authorize the maintenance of a nuisance, or a danger to public health and safety. The permitted facility must comply with all applicable requirements, including release reporting under LAC 33:I.3901.

- XVIII. Provisions of this permit may be appealed in writing pursuant to La. R.S. 30:2024(A) within 30 days from receipt of the permit. Only those provisions specifically appealed will be suspended by a request for hearing, unless the secretary or the assistant secretary elects to suspend other provisions as well. Construction cannot proceed except as specifically approved by the secretary or assistant secretary. A request for hearing must be sent to the following:

Attention: Office of the Secretary, Legal Services Division  
La. Dept. of Environmental Quality  
Post Office Box 4302  
Baton Rouge, Louisiana 70821-4302

- XIX. Certain Part 70 general conditions may duplicate or conflict with state general conditions. To the extent that any Part 70 conditions conflict with state general conditions, then the Part 70 general conditions control. To the extent that any Part 70 general conditions duplicate any state general conditions, then such state and Part 70 provisions will be enforced as if there is only one condition rather than two conditions.

**General Information**

**AI ID: 4384 Shell Chemical LP - Norco Chemical Plant West Site**  
**Activity Number: PER20070002**  
**Permit Number: 2889-V1**  
**Air - Title V Regular Permit Renewal**

**Also Known As:**

ID	Name	User Group	Start Date
2520-00008	SCOGI LA Holdings LLC - Norco Chemical Plant West Site	CDS Number	05-27-1993
LAR000042226	Shell Norco Chemical Plant West Site	Hazardous Waste Notification	10-03-2000
PMT/CA	GPRA Baselines	Hazardous Waste Permitting	10-01-1997
LA0005762	WPC File Number	LPDES Permit #	06-25-2003
WP1154	WPC State Permit Number	LWDPS Permit #	06-25-2003
GPD-089-2265	Priority 1 Emergency Site	Priority 1 Emergency Site	07-18-2006
17651	Shell Chemical Co - Norco	Solid Waste Facility No.	01-08-2002
17674	Shell Chemical Co Norco West Site	TEMPO Merge	02-21-2001
19275	Shell Oil Chemical Co West Site	TEMPO Merge	02-21-2001
70079SHLL265RI	Shell Norco Chemical Plant West Site	TEMPO Merge	02-21-2001
45016618	TRI #	Toxic Release Inventory	07-19-2004
	Shell Chemical LP - Norco Chemical Plant West Site	UST FID #	09-10-1999

**Physical Location:**

16122 River Rd  
 (a portion of)  
 Norco, LA 70079

**Main FAX:** 5044656360  
**Main Phone:** 5044657222

**Mailing Address:**

PO Box 10  
 Norco, LA 700790010

**Location of Front Gate:**

30° 0' 21" 53 hundredths latitude, 90° 25' 22" 25 hundredths longitude, Coordinate Method: GPS Code (Pseudo Range) Differential, Coordinate Datum: NAD83

**Related People:**

Name	Mailing Address	Phone (Type)	Relationship
Oliver Boyd	PO Box 10 Norco, LA 700790010	5044656315 (WP)	Water Billing Party for
Andrew Englande	PO Box 10 Norco, LA 700790010	5044657011 (WP)	Emission Inventory Contact for
Andrew Englande	PO Box 10 Norco, LA 700790010	ANDREW.ENGLANI	Emission Inventory Contact for
Fred Goodson	PO Box 10 Norco, LA 700790010	5044657609 (WP)	Hazardous Waste Permit Contact For
Fred Goodson	PO Box 10 Norco, LA 700790010	5044657609 (WP)	Haz. Waste Billing Party for
Fred Goodson	PO Box 10 Norco, LA 700790010	5044657609 (WP)	Solid Waste Billing Party for
Ragina Isham	PO Box 10 Norco, LA 700790010	5044656321 (WP)	Air Permit Contact For
Ragina Isham	PO Box 10 Norco, LA 700790010	5044656321 (WP)	Air Billing Contact for
A. W. Pearce	PO Box 10 Norco, LA 700790010	5044657668 (WP)	Accident Prevention Contact for
A. W. Pearce	PO Box 10 Norco, LA 700790010	5044656729 (WF)	Accident Prevention Contact for
Suzanne Postlethwaite	PO Box 10 Norco, LA 700790010	5044657668 (WP)	Accident Prevention Contact for
Suzanne Postlethwaite	PO Box 10 Norco, LA 700790010	5044657668 (WP)	Accident Prevention Contact for
Suzanne Postlethwaite	PO Box 10 Norco, LA 700790010	5044656729 (WF)	Accident Prevention Contact for
Suzanne Postlethwaite	PO Box 10 Norco, LA 700790010	5044657668 (WP)	Accident Prevention Billing Party for
Suzanne Postlethwaite	PO Box 10 Norco, LA 700790010	5044656729 (WF)	Accident Prevention Billing Party for

**General Information**

**AI ID: 4384 Shell Chemical LP - Norco Chemical Plant West Site**  
**Activity Number: PER20070002**  
**Permit Number: 2889-V1**  
**Air - Title V Regular Permit Renewal**

Related Organizations:	Name	Address	Phone (Type)	Relationship
	SCOGI LA Holdings LLC	PO Box 2463 Houston, TX 77252		Owns
	Shell Chemical LP	PO Box 10 Norco, LA 700790010	5044656360 (WF)	Haz. Waste Billing Party for
	Shell Chemical LP	PO Box 10 Norco, LA 700790010	5044657220 (WPP)	Haz. Waste Billing Party for
	Shell Chemical LP	PO Box 10 Norco, LA 700790010	5044656360 (WF)	Air Billing Party for
	Shell Chemical LP	PO Box 10 Norco, LA 700790010	5044656360 (WF)	Operates
	Shell Chemical LP	PO Box 10 Norco, LA 700790010	5044657220 (WPP)	Operates
	Shell Chemical LP	PO Box 10 Norco, LA 700790010	5044657220 (WPP)	Air Billing Party for
	Shell Oil Co	PO Box 10 Norco, LA 700790010		Operates

Note: This report entitled "General Information" contains a summary of facility-level information contained in LDEQ's TEMPO database for this facility and is not considered a part of the permit. Please review the information contained in this document for accuracy and completeness. If any changes are required or if you have questions regarding this document, you may contact Mr. David Ferrand, Environmental Assistance Division, at (225) 219-3247 or email your changes to [facupdate@la.gov](mailto:facupdate@la.gov).

**INVENTORIES**

**AI ID: 4384 - Shell Chemical LP - Norco Chemical Plant West Site**  
**Activity Number: PER20070002**  
**Permit Number: 2889-V1**  
**Air - Title V Regular Permit Renewal**

**Subject Item Inventory:**

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
<b>Norco Chemical Plant - West Site Facilities</b>						
ARE0007	236-13 - Emissions from misc small wastewater sources (small sumps, etc) associated with the T-Unit process					8760 hr/yr (All Year)
EQT0002	175 - Biosolids Incinerator (FT-701)		10.5 tons/hr	8.18 tons/hr		8760 hr/yr (All Year)
EQT0003	176 - Ash Silo and associated ash truck loading (Includes loading of rolloff boxes when needed)		4 tons/hr	1.08 tons/hr		8760 hr/yr (All Year)
EQT0004	236-1 - API receiver, effluent sumps, and connecting in-ground channels	112140 gallons				8760 hr/yr (All Year)
EQT0005	236-2 - T-T202 Open	110000 bbl				8760 hr/yr (All Year)
EQT0006	236-3 - pH Control Sumps (A-T210/11/12)	61575 gallons				8760 hr/yr (All Year)
EQT0007	236-4 - Primary Clarifier (A-T213)	995190 gallons				8760 hr/yr (All Year)
EQT0008	236-5 - T-T252 Open	28200 gallons				8760 hr/yr (All Year)
EQT0009	236-6 - T-T251 IFR	948050 gallons				8760 hr/yr (All Year)
EQT0010	236-7 - T-T351 Open	115000 bbl				8760 hr/yr (All Year)
EQT0011	236-8 - T-T352 Open	115000 bbl				8760 hr/yr (All Year)
EQT0012	187 - T-6260 FR	13324 gallons				8760 hr/yr (All Year)
EQT0013	236-9 - Belt Press/Filter					8760 hr/yr (All Year)
EQT0014	236-10 - T-T504 Open	368467 gallons				8760 hr/yr (All Year)
EQT0015	236-11 - T-T1101 Open	34000 bbl				8760 hr/yr (All Year)
EQT0016	223 - Bioreator Effluent Backup Pump Diesel Engine (DP-T206)		420 horsepower	350 horsepower		1564 hr/yr (All Year)
EQT0017	236-14 - T-T206 FR	38070 gallons				8760 hr/yr (All Year)
EQT0018	236-15 - A-T501 Resins Trap	63448 gallons				8760 hr/yr (All Year)
EQT0019	EDC STRIPPER - Vent from EDC Stripper to NCIN-1/2			10 gallons/min		8760 hr/yr (All Year)
FUG0001	236-12 - Fugitive Emissions from pumps, valves, flanges, etc.					8760 hr/yr (All Year)
FUG0003	142 - Area Fugitive Emissions West Site C3/C4 Systems					8760 hr/yr (All Year)

**Stack Information:**

ID	Description	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (oF)
<b>Norco Chemical Plant - West Site Facilities</b>							
EQT0002	175 - Biosolids Incinerator (FT-701)	99	32413	2.63		73	180
EQT0003	176 - Ash Silo and associated ash truck loading (Includes loading of rolloff boxes when needed)	30	1400	.5		75	150
EQT0004	236-1 - API receiver, effluent sumps, and connecting in-ground channels						
EQT0005	236-2 - T-T202 Open				160	30	
EQT0006	236-3 - pH Control Sumps (A-T210/11/12)					14	
EQT0007	236-4 - Primary Clarifier (A-T213)			110		14	
EQT0008	236-5 - T-T252 Open			20		12	
EQT0009	236-6 - T-T251 IFR					24	
EQT0010	236-7 - T-T351 Open			203		20	

**INVENTORIES**

**AI ID: 4384 - Shell Chemical LP - Norco Chemical Plant West Site**  
**Activity Number: PER20070002**  
**Permit Number: 2889-V1**  
**Air - Title V Regular Permit Renewal**

**Stack Information:**

ID	Description	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (oF)
<b>Norco Chemical Plant - West Site Facilities</b>							
EQT0011	236-8 - T-T352 Open			203		20	
EQT0012	187 - T-6260 FR					15	
EQT0013	236-9 - Belt Press/Filter			56		20	
EQT0014	236-10 - T-T504 Open			100		24	
EQT0015	236-11 - T-T1101 Open					10	820
EQT0016	223 - Biotreater Effluent Backup Pump Diesel Engine (DP-T206)	1	3170	18		20	
EQT0017	236-14 - T-T206 FR			30		13	
EQT0018	236-15 - A-T501 Resins Trap						

**Relationships:**

**Subject Item Groups:**

ID	Group Type	Group Description
CRG0001	Common Requirements Group	CRG1 - Biotreater System CRG1
CRG0002	Common Requirements Group	CRG2 - Biotreater System CRG2
GRP0006	Equipment Group	236 - Biotreater System
UNF0003	Unit or Facility Wide	AI4384 - Norco Chemical Plant - West Site Facilities

**Group Membership:**

ID	Description	Member of Groups
ARE0007	236-13 - Emissions from misc small wastewater sources (small sumps, etc) associated with the T-Unit process	CRG0000000001, GRP0000000006
EQT0004	236-1 - API receiver, effluent sumps, and connecting in-ground channels	CRG0000000002, GRP0000000006
EQT0005	236-2 - T-T202 Open	CRG0000000002, GRP0000000006
EQT0006	236-3 - pH Control Sumps (A-T210/11/12)	CRG0000000002, GRP0000000006
EQT0007	236-4 - Primary Clarifier (A-T213)	CRG0000000002, GRP0000000006
EQT0008	236-5 - T-T252 Open	CRG0000000002, GRP0000000006
EQT0009	236-6 - T-T251 IFR	CRG0000000001, GRP0000000006
EQT0010	236-7 - T-T351 Open	CRG0000000001, GRP0000000006
EQT0011	236-8 - T-T352 Open	CRG0000000001, GRP0000000006
EQT0013	236-9 - Belt Press/Filter	CRG0000000002, GRP0000000006
EQT0014	236-10 - T-T504 Open	CRG0000000002, GRP0000000006
EQT0015	236-11 - T-T1101 Open	CRG0000000002, GRP0000000006
EQT0017	236-14 - T-T206 FR	CRG0000000002, GRP0000000006
EQT0018	236-15 - A-T501 Resins Trap	CRG0000000002, GRP0000000006
EQT0019	EDC STRIPPER - Vent from EDC Stripper to NCIN-1/2	CRG0000000002, GRP0000000006

**NOTE: The UNF group relationship is not printed in this table. Every subject item is a member of the UNF group**

**INVENTORIES**

**AI ID: 4384 - Shell Chemical LP - Norco Chemical Plant West Site**  
**Activity Number: PER20070002**  
**Permit Number: 2889-V1**  
**Air - Title V Regular Permit Renewal**

**Annual Maintenance Fee:**

Fee Number	Air Contaminant Source	Multiplier	Units Of Measure
0630	Organic Oxides, Alcohols, Glycols (Rated Capacity)	250	MM Lb/Yr

**SIC Codes:**

2869	Industrial organic chemicals, nec	A14384
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**EMISSION RATES FOR CRITERIA POLLUTANTS**

AI ID: 4384 - Shell Chemical LP - Norco Chemical Plant West Site

Activity Number: PER20070002

Permit Number: 2889-V1

Air - Title V Regular Permit Renewal

Subject Item	CO			NOx			PM10			SO2			VOC		
	Avg lb/hr	Max lb/hr	Tons/Year												
Norco Chemical Plant - West Site Facilities															
EQT 0002 175	7.19	9.30	31.51	7.36	33.71	32.24	2.75	3.18	12.07	2.10	2.42	9.18	0.86	1.11	3.77
EQT 0003 176							2.160	8.000	9.470						
EQT 0012 187													0.055	0.055	0.240
EQT 0016 223	2.780	3.340	2.180	12.210	14.650	9.550	0.140	0.170	0.110	1.340	1.610	1.050	0.270	0.320	0.210
FUG 0003 142													5.45		23.89
GRP 0006 236													41.48	491.27	136.33

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote.

### EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 4384 - Shell Chemical LP - Norco Chemical Plant West Site

Activity Number: PER20070002

Permit Number: 2889-V1

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0002 175	Antimony (and compounds)	< 0.001	< 0.001	< 0.001
	Arsenic (and compounds)	0.001	0.001	0.003
	Barium (and compounds)	0.001	0.002	0.006
	Beryllium (Table 51.1)	< 0.001	< 0.001	< 0.001
	Cadmium (and compounds)	< 0.001	< 0.001	0.001
	Chlorinated Dibenzo-P-Dioxins	1.61E-8	1.86E-8	7.07E-8
	Chlorinated dibenzofurans	1.61E-8	1.86E-8	7.07E-8
	Chromium VI (and compounds)	0.001	0.002	0.005
	Cobalt compounds	< 0.001	< 0.001	< 0.01
	Copper (and compounds)	0.010	0.010	0.050
	Hydrochloric acid	3.70	4.27	16.20
	Lead compounds	0.002	0.002	0.007
	Manganese (and compounds)	0.002	0.002	0.010
	Mercury (and compounds)	0.020	0.020	0.080
	Nickel (and compounds)	0.002	0.003	0.010
Selenium (and compounds)	0.060	0.070	0.250	
Zinc (and compounds)	0.150	0.190	0.640	
EQT 0003 176	Arsenic (and compounds)	0.001	0.001	0.001
	Barium (and compounds)	0.001	0.002	0.002
	Cadmium (and compounds)	0.001	0.001	0.001
	Chromium VI (and compounds)	0.001	0.005	0.006
	Copper (and compounds)	0.001	0.004	0.004
	Lead compounds	0.001	0.001	0.001
	Manganese (and compounds)	0.002	0.007	0.008
	Mercury (and compounds)	0.001	0.001	0.001
	Nickel (and compounds)	0.001	0.001	0.001
	Selenium (and compounds)	0.001	0.001	0.001
Zinc (and compounds)	0.003	0.011	0.013	
EQT 0012 187	1,2-Dichloroethane	0.054	0.054	0.240
FUG 0003 142	1,3-Butadiene	0.015		0.068
	Hydrogen sulfide		< 0.01	< 0.01
	Methanol		< 0.01	< 0.01
	Methyl Tertiary Butyl Ether		< 0.01	< 0.01
GRP 0006 236	1,2-Dichloroethane	0.285	6.138	0.887

**EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS**

AI ID: 4384 - Shell Chemical LP - Norco Chemical Plant West Site

Activity Number: PER20070002

Permit Number: 2889-V1

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
GRP 0006 236	1,2-Dichloropropane	0.54	57.03	2.18
	1,3-Butadiene	0.388	0.861	1.700
	1,3-Dichloropropene	0.58	35.35	2.17
	1,4-Dioxane	0.56	5.81	1.11
	Acetonitrile	0.11	0.28	0.48
	Acrolein	0.005	0.051	0.022
	Ammonia	1.92	3.63	5.38
	Aniline	0.01	0.35	0.01
	Benzene	0.18	0.73	0.63
	Chlorobenzene	0.020	0.207	0.062
	Chloroethane	< 0.01	0.01	< 0.01
	Cresol	0.10	0.55	0.31
	Cumene	0.01	0.01	0.02
	Dichloromethane	< 0.01	0.01	< 0.01
	Diethanolamine	< 0.01	< 0.01	< 0.01
	Epichlorohydrin	1.78	25.04	4.81
	Ethyl benzene	0.03	0.07	0.13
	Hydrazine	0.005	0.009	0.020
	Hydrogen sulfide	0.35	2.06	1.49
	Methanol	0.21	0.92	0.94
	Methyl Tertiary Butyl Ether	0.06	0.17	0.28
	Methyl ethyl ketone	1.90	85.83	4.44
	Methyl isobutyl ketone	4.05	44.70	11.02
	Naphthalene	0.17	0.44	0.75
	Phenol	0.01	0.08	0.04
	Phthalic Anhydride	< 0.01	< 0.01	< 0.01
	Styrene	1.48	2.92	6.47
	Toluene	0.25	3.08	0.92
Xylene (mixed isomers)	0.11	1.10	0.34	
n-Hexane	0.38	1.32	1.64	
n-butyl alcohol	1.58	11.82	4.67	
UNF 0003 AI4384	1,2-Dichloroethane			1.127
	1,2-Dichloropropane			2.18
	1,3-Butadiene			1.768

**EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS**

AI ID: 4384 - Shell Chemical LP - Norco Chemical Plant West Site

Activity Number: PER20070002

Permit Number: 2889-V1

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
UNF 0003 AI4384	1,3-Dichloropropene			2.17
	1,4-Dioxane			1.11
	Acetonitrile			0.48
	Acrolein			0.022
	Ammonia			5.38
	Aniline			0.01
	Antimony (and compounds)			< 0.001
	Arsenic (and compounds)			0.004
	Barium (and compounds)			0.008
	Benzene			0.63
	Beryllium (Table 51.1)			< 0.001
	Cadmium (and compounds)			0.002
	Chlorinated Dibenzo-P-Dioxins			7.07E-8
	Chlorinated dibenzofurans			7.07E-8
	Chlorobenzene			0.062
	Chloroethane			< 0.01
	Chromium VI (and compounds)			0.011
	Cobalt compounds			< 0.01
	Copper (and compounds)			0.054
	Cresol			0.31
	Cumene			0.02
	Dichloromethane			< 0.01
	Diethanolamine			< 0.01
	Epichlorohydrin			4.81
	Ethyl benzene			0.13
	Hydrazine			0.020
	Hydrochloric acid			16.20
	Hydrogen sulfide			1.49
	Lead compounds			0.008
	Manganese (and compounds)			0.018
Mercury (and compounds)			0.081	
Methanol			0.94	
Methyl Tertiary Butyl Ether			0.28	
Methyl ethyl ketone			4.44	

**EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS**

AI ID: 4384 - Shell Chemical LP - Norco Chemical Plant West Site

Activity Number: PER20070002

Permit Number: 2889-V1

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
UNF 0003 A14384	Methyl isobutyl ketone			11.02
	Naphthalene			0.75
	Nickel (and compounds)			0.011
	Phenol			0.04
	Phthalic Anhydride			< 0.01
	Selenium (and compounds)			0.251
	Styrene			6.47
	Toluene			0.92
	Xylene (mixed isomers)			0.34
	Zinc (and compounds)			0.653
	n-Hexane			1.64
	n-butyl alcohol			4.67

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote.

**SPECIFIC REQUIREMENTS**

**AI ID: 4384 - Shell Chemical LP - Norco Chemical Plant West Site**

**Activity Number: PER20070002**

**Permit Number: 2889-V1**

**Air - Title V Regular Permit Renewal**

**CRG0001 CRG1 - Biotreater System CRG1**

**Group Members: ARE0007 EQT0009 EQT0010 EQT0011**

- 1 [40 CFR 63.1103(e)(Table 7)g Shall comply with all applicable provisions of 40 CFR 63 Subpart YY by complying with 40 CFR 61 Subpart FF. [40 CFR 63.1103(e)(Table 7)g, 40 CFR 63.1095(b)(2), 40 CFR 61.342(e)]
- 2 [40 CFR 63.647(a)] Shall comply with all applicable provisions of 40 CFR 63 Subpart CC by complying with 40 CFR 61 Subpart FF. [40 CFR 63.647(a)]
- 3 [LAC 33:III.5109.A] Shall comply with all applicable provisions of 40 CFR 61 Subpart FF - Determined as MACT.

**CRG0002 CRG2 - Biotreater System CRG2**

**Group Members: EQT0004 EQT0005 EQT0006 EQT0007 EQT0008 EQT0013 EQT0014 EQT0015 EQT0017 EQT0018 EQT0019**

- 4 [LAC 33:III.5109.A] Shall comply with all applicable provisions of 40 CFR 61 Subpart FF - Determined as MACT.

**EQT0002 175 - Biosolids Incinerator (FT-701)**

- 5 [40 CFR 61.52(b)] Mercury <= 7.1 lb per 24 hours. [40 CFR 61.52(b)]  
Which Months: All Year Phases: Statistical Basis:
- 6 [LAC 33:III.1101.B] Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.  
Which Months: All Year Statistical Basis: None specified
- 7 [LAC 33:III.1513] Equipment/operational data recordkeeping by electronic or hard copy at the approved frequency. Record and keep on site for at least two years the data required to demonstrate exemption from the provisions of LAC 33:III.Chapter 15. Record all emissions data in the units of the standard using the averaging time of the standard. Make records available to a representative of DEQ or the U.S. EPA on request.
- 8 [LAC 33:III.5109.A] Shall utilize a direct flame afterburner, packed scrubber, eductor scrubber, and wet electrostatic precipitator (ESP) to control TAP emissions - Determined as MACT.

**EQT0003 176 - Ash Silo and ash loading**

- 9 [LAC 33:III.1305] Prevent particulate matter from becoming airborne by taking all reasonable precautions. These precautions shall include, but not be limited to, those specified in LAC 33:III.1305.1-7.
- 10 [LAC 33:III.501.C.6] Pressure drop monitored by pressure drop instrument during loading.  
Which Months: All Year Statistical Basis: Instantaneous determination
- 11 [LAC 33:III.5109] Ash handling shall be enclosed and ash silo shall be equipped with a dust filter - Determined as MACT.

**EQT0012 187 - T-6260 FR**

- 12 [LAC 33:III.5109] Shall comply with all applicable provisions of 40 CFR 61 Subpart FF - Determined as MACT.

**SPECIFIC REQUIREMENTS**

**AI ID: 4384 - Shell Chemical LP - Norco Chemical Plant West Site**

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**Permit Number: 2889-V1**

**Air - Title V Regular Permit Renewal**

**EQT0016 223 - Biotreater Effluent Backup Pump Diesel Engine (DP-T206)**

13 [LAC 33:III.1101.B]

Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.

Which Months: All Year Statistical Basis: None specified

14 [LAC 33:III.1513]

Equipment/operational data recordkeeping by electronic or hard copy at the approved frequency. Record and keep on site for at least two years the data required to demonstrate exemption from the provisions of LAC 33:III.Chapter 15. Record all emissions data in the units of the standard using the averaging time of the standard. Make records available to a representative of DEQ or the U.S. EPA on request.

**FUG0001 236-12 - Fugitive Emissions**

15 [LAC 33:III.525]

Permittee may add/remove/replace fugitive components without an approved permit modification, provided that:

1. The changes in components involve routine maintenance or are taken to address safety concerns, or involve small piping revisions with no associated emissions increases except from the fugitive emission components themselves;
2. The changes do not involve any associated increase in production rate or capacity, or tie in of new or modified process equipment other than the piping components;
3. Actual emissions following the changes will not exceed the emission limits contained in this permit;
4. The changes do not trigger permit modifications as defined in LAC 33:III.525 and LAC 33:III.527; and
5. The components are promptly incorporated into any applicable leak detection and repair program.

**UNF0003 Norco Chemical Plant - West Site Facilities**

16 [40 CFR 60.]

All affected facilities shall comply with all applicable provisions in 40 CFR 60 Subpart A.

17 [40 CFR 61.145]

Shall comply all applicable requirements of 40 CFR 61.145(b) and (c) for asbestos demolition and renovation activities.

18 [40 CFR 61.342(b)(2)]

As part of the waiver application submitted under 40 CFR 61.342(b)(1), the owner or operator shall submit to the DEQ a plan under 40 CFR 61.10(b)(3) that is an enforceable commitment to obtain environmental benefits to mitigate the benzene emissions that result from extending the compliance date. The plan shall include the information specified in 40 CFR 61.342(b)(2)(i-iii). [40 CFR 61.342(b)(2)]  
Comply with the requirements of 40 CFR 61.342(c) through (h) no later than 90 days following the effective date, unless a waiver of compliance has been obtained under 40 CFR 61.11, or by the initial startup for a new source with an initial startup after the effective date. Subpart FF. [40 CFR 61.342(b)]

20 [40 CFR 61.342(e)(2)(i)]

Benzene <= 6 Mg/yr (6.6 ton/yr), as determined in 40 CFR 61.355(k). Subpart FF. [40 CFR 61.342(e)(2)(i)]

21 [40 CFR 61.355]

Which Months: All Year Statistical Basis: None specified

Determine compliance with 40 CFR 61 Subpart FF using the test methods and procedures specified in 40 CFR 61.355(a) through (i), as applicable. Subpart FF.

22 [40 CFR 61.356]

Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain records as specified in 40 CFR 61.356(a) through (n), as applicable. Maintain each record in a readily accessible location at the facility site for a period not less than two years from the date the information is recorded unless otherwise specified. Subpart FF.

**SPECIFIC REQUIREMENTS**

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**UNF0003 Norco Chemical Plant - West Site Facilities**

- 23 [40 CFR 61.357(d)(2)] Submit report: Due annually, beginning on the date that equipment necessary to comply with 40 CFR 61 Subpart FF has been certified in accordance with 40 CFR 61.357(d)(1). Submit updates to the information listed in 40 CFR 61.357(a)(1) through (a)(3) or, if the information in 40 CFR 61.357(a)(1) through (3) is not changed in the following year, a statement to that effect. Subpart FF. [40 CFR 61.357(d)(2)]
- 24 [40 CFR 61.357(d)(5)] Include in the report required by 40 CFR 61.357(d)(2) a table presenting the information specified in 40 CFR 61.357(d)(5)(i) and (d)(5)(ii) for each waste stream. Subpart FF. [40 CFR 61.357(d)(5)]
- 25 [40 CFR 61.357(d)(6)] Submit report: Due quarterly, beginning three months after the date that the equipment necessary to comply with 40 CFR 61 Subpart FF has been certified in accordance with 40 CFR 61.357(d)(1). Submit a certification that all of the required inspections have been carried out in accordance with the requirements of 40 CFR 61 Subpart FF. Subpart FF. [40 CFR 61.357(d)(6)]
- 26 [40 CFR 61.357(d)(7)] Submit report: Due quarterly, beginning three months after the date that the equipment necessary to comply with 40 CFR 61 Subpart FF has been certified in accordance with 40 CFR 61.357(d)(1). Include the information specified in 40 CFR 61.357(d)(7)(i) through (d)(7)(v). Subpart FF. [40 CFR 61.357(d)(7)]
- 27 [40 CFR 61.357(d)(8)] Submit report: Due annually, beginning one year after the date that the equipment necessary to comply with 40 CFR 61 Subpart FF has been certified in accordance with 40 CFR 61.357(d)(1). Submit a report that summarizes all inspections required by 40 CFR 61.342 through 61.354 during which detectable emissions are measured or a problem that could result in benzene emissions is identified, including information about the repairs or corrective action taken. Subpart FF. [40 CFR 61.357(d)(8)]
- 28 [40 CFR 61.] All affected facilities shall comply with all applicable provisions in 40 CFR 61 Subpart A.
- 29 [40 CFR 63.683(b)(1)(iii)] Receives only waste with concentration of VOHAP < 500 ppmw. Perform initial VOHAP concentration compliance determination. [40 CFR 63.683(b)(1)(iii)]
- 30 [40 CFR 63.] Which Months: All Year Statistical Basis: Annual average
- 31 [LAC 33:III.2113.A] All affected facilities shall comply with all applicable provisions in 40 CFR 63 Subpart A as delineated in Table xx of 40 CFR 63 Subpart xx. Maintain best practical housekeeping and maintenance practices at the highest possible standards to reduce the quantity of organic compounds emissions. Good housekeeping shall include, but not be limited to, the practices listed in LAC 33:III.2113.A.1-5.
- 32 [LAC 33:III.219] Failure to pay the prescribed application fee or annual fee as provided herein, within 90 days after the due date, will constitute a violation of these regulations and shall subject the person to applicable enforcement actions under the Louisiana Environmental Quality Act including, but not limited to, revocation or suspension of the applicable permit, license, registration, or variance.
- 33 [LAC 33:III.2901.D] Discharges of odorous substances at or beyond property lines which cause a perceived odor intensity of six or greater on the specified eight point butanol scale as determined by Method 41 of LAC 33:III.2901.G are prohibited.
- 34 [LAC 33:III.2901.F] If requested to monitor for odor intensity, take and transport samples in a manner which minimizes alteration of the samples either by contamination or loss of material. Evaluate all samples as soon after collection as possible in accordance with the procedures set forth in LAC 33:III.2901.G.
- 35 [LAC 33:III.507.E.4] Any permit application to renew an existing permit shall be submitted at least six months prior to the date of permit expiration, or at such earlier time as may be required by the existing permit or approved by the permitting authority. In no event shall the application for permit renewal be submitted more than 18 months before the date of permit expiration.
- 36 [LAC 33:III.5105.A.1] Do not construct or modify any stationary source subject to any standard set forth in LAC 33:III.Chapter 51.Subchapter A without first obtaining written authorization from DEQ in accordance with LAC 33:III.Chapter 51.Subchapter A, after the effective date of the standard.

**SPECIFIC REQUIREMENTS**

**AI ID: 4384 - Shell Chemical LP - Norco Chemical Plant West Site**

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**UNF0003 Norco Chemical Plant - West Site Facilities**

- 37 [LAC 33:III.5105.A.2] Do not cause a violation of any ambient air standard listed in LAC 33:III. Table 51.2, unless operating in accordance with LAC 33:III.5109.
- 38 [LAC 33:III.5105.A.3] Do not build, erect, install, or use any article, machine, equipment, process, or method, the use of which conceals an emission that would otherwise constitute a violation of an applicable standard.
- 39 [LAC 33:III.5105.A.4] Do not fail to keep records, notify, report or revise reports as required under LAC 33:III. Chapter 51. Subchapter A.
- 40 [LAC 33:III.5107.A.2] Submit Annual Emissions Report (TED): Due annually, by the 1st of July, to the Office of Environmental Assessment, Air Quality Assessment Division, in a format specified by DEQ. Identify the quantity of emissions in the previous calendar year for any toxic air pollutant listed in Table 51.1 or Table 51.3.
- 41 [LAC 33:III.5107.A.3] Include a certification statement with initial and subsequent annual emission reports and revisions to any emission report to attest that the information contained in the emission report is true, accurate, and complete, and signed by a responsible official, as defined in LAC 33:III.502. Include the full name of the responsible official, title, signature, date of signature and phone number of the responsible official. The certification statement shall read: "I certify, under penalty of perjury, that the emissions data provided is accurate to the best of my knowledge, information, and belief, and I understand that submitting false or misleading information will expose me to prosecution under state regulations"
- 42 [LAC 33:III.5107.B.1] Submit notification: Due to the Department of Public Safety 24-hour Louisiana Emergency Hazardous Materials Hotline at (225) 925-6595 immediately, but no later than 1 hour, after any discharge of a toxic air pollutant into the atmosphere which results or threatens to result in an emergency condition (a condition which could reasonably be expected to endanger the health and safety of the public, cause significant adverse impact to the land, water or air environment, or cause severe damage to property).
- 43 [LAC 33:III.5107.B.2] Submit notification: Due to the Office of Environmental Compliance, Emergency and Radiological Services Division, Single Point of Contact (SPOC), except as provided in LAC 33:III.5107.B.6, no later than 24 hours after the beginning of any unauthorized discharge into the atmosphere of a toxic air pollutant as a result of bypassing an emission control device, when the emission control bypass was not the result of an upset, and the quantity of the unauthorized bypass is greater than or equal to the lower of the Minimum Emission Rate (MER) in LAC 33:III.5112, Table 51.1, or a reportable quantity (RQ) in LAC 33:III.3931, or the quantity of the unauthorized bypass is greater than one pound and there is no MER or RQ for the substance in question. Submit notification in the manner provided in LAC 33:III.3923.
- 44 [LAC 33:III.5107.B.3] Submit notification: Due to the Office of Environmental Compliance, Emergency and Radiological Services, SPOC, immediately, but in no case later than 24 hours after any unauthorized discharge of a toxic air pollutant into the atmosphere that does not cause an emergency condition, the rate or quantity of which is in excess of that allowed by permit, compliance schedule, or variance, or for upset events that exceed the reportable quantity in LAC 33:III.3931, except as provided in LAC 33:III.5107.B.6. Submit notification in the manner provided in LAC 33:III.3923.
- 45 [LAC 33:III.5107.B.4] Submit written report: Due within seven calendar days of learning of any such discharge or equipment bypass as referred to in LAC 33:III.5107.B.1 through 3. Submit report to the Office of Environmental Compliance by certified mail. Include the information specified in LAC 33:III.5107.B.4.a.i through viii.
- 46 [LAC 33:III.5107.B.5] Report all discharges to the atmosphere of a toxic air pollutant from a safety relief device, a line or vessel rupture, a sudden equipment failure, or a bypass of an emission control device, regardless of quantity, in the annual emissions report and where otherwise specified. Include the identity of the source, the date and time of the discharge, and the approximate total loss during the discharge.
- 47 [LAC 33:III.5111.A] Do not commence construction or modification of any major source without first obtaining written authorization from DEQ, as specified.
- 48 [LAC 33:III.5113.A.1] Submit notification in writing: Due to the Office of Environmental Compliance, Emergency and Radiological Services Division, SPOC, not more than 60 days not less than 30 days prior to initial start-up. Submit the anticipated date of the initial start-up.

**SPECIFIC REQUIREMENTS**

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- 49 [LAC 33:III.5113.A.2] Submit notification in writing: Due to the Office of Environmental Compliance, Emergency and Radiological Services Division, SPOC, within 10 working days after the actual date of initial start-up of the source. Submit the actual date of initial start-up of the source.
- 50 [LAC 33:III.5151] Shall comply all applicable requirements of LAC 33:III.5151.C through 5151.P for asbestos demolition and renovation activities.
- 51 [LAC 33:III.517.B.1] Any application form, report, or compliance certification submitted under this Chapter shall contain certification by a responsible official of truth, accuracy, and completeness. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information contained in the application are true, accurate, and complete.
- 52 [LAC 33:III.517.C] Submit supplementary facts or corrected information: Due promptly upon becoming aware of failure to submit or incorrect submittal regarding permit applications. In addition, provide information as necessary to address any requirements that become applicable to the source after the date of filing a complete application but prior to release of a proposed permit.
- 53 [LAC 33:III.517.D] Submit applications for permits in accordance with forms and guidance provided by the DEQ. At a minimum, each permit application submitted under LAC 33:III.Chapter 5 shall contain the information specified in LAC 33:III.517.D, subparagraphs 1-18.
- 54 [LAC 33:III.517.E] In addition to those elements listed under LAC 33:III.517.D, include in each application pertaining to a Part 70 source the information specified in LAC 33:III.517.E, Subparagraphs 1-8.
- 55 [LAC 33:III.5609.A.1.b] Activate the preplanned abatement strategy listed in LAC 33:III.5611. Table 5 when the administrative authority declares an Air Pollution Alert.
- 56 [LAC 33:III.5609.A.2.b] Activate the preplanned strategy listed in LAC 33:III.5611. Table 6 when the administrative authority declares an Air Pollution Warning.
- 57 [LAC 33:III.5609.A.3.b] Activate the preplanned abatement strategy listed in LAC 33:III.5611. Table 7 when the administrative authority declares an Air Pollution Emergency.
- 58 [LAC 33:III.5609.A] Prepare standby plans for the reduction of emissions during periods of Air Pollution Alert, Air Pollution Warning and Air Pollution Emergency.
- 59 [LAC 33:III.5901.A] Design standby plans to reduce or eliminate emissions in accordance with the objectives as set forth in LAC 33:III.5611. Tables 5, 6, and 7. Comply with the provisions in 40 CFR 68, except as specified in LAC 33:III.5901.
- 60 [LAC 33:III.5907] Identify hazards that may result from accidental releases of the substances listed in 40 CFR 68.130, Table 59.0 of LAC 33:III.5907, or Table 59.1 of LAC 33:III.5913 using appropriate hazard assessment techniques, design and maintain a safe facility, and minimize the off-site consequences of accidental releases of such substances that do occur.
- 61 [LAC 33:III.5911.A] Submit registration: Due January 31, 1998, or within 60 days after the source becomes subject to LAC 33:III.Chapter 59, whichever is later. Include the information listed in LAC 33:III.5911.B, and submit to the Department of Environmental Quality, Office of Environmental Compliance, Emergency and Radiological Services Division.
- 62 [LAC 33:III.5911.C] Submit amended registration: Due to the Department of Environmental Quality, Office of Environmental Compliance, Emergency and Radiological Services Division, within 60 days after the information in the submitted registration is no longer accurate.
- 63 [LAC 33:III.919.D] Submit Emission Inventory (EI)/Annual Emissions Statement: Due annually, by the 31st of March for the period January 1 to December 31 of the previous year unless otherwise directed. Submit emission inventory data in the format specified by the Office of Environmental Assessment, Air Quality Assessment Division. Include all data applicable to the emissions source(s), as specified in LAC 33:III.919.A-D.

**BEST COPY**

<b>Submitted by:</b> DAN NGUYEN		<b>Activity No:</b> PER20070002	
<b>Permit Writer</b> DAN NGUYEN@LA.GOV		<b>September 7, 2007</b>	
<b>Email address:</b>			

**Instructions**

**Permit Reference** – Indicate specific portion(s) of the permit to which the remark relates (i.e. “Specific Condition 120”, or “Section II Air Permits Briefing Sheet”, etc.).

**Remarks** – Explain the basis for each remark. Provide regulatory citations where possible. If the remark is made due to an error or omission in the permit application this must be noted and the revised information **must be submitted**. Revised information may be submitted separately from this worksheet. Please be aware that revised information must be submitted in writing and certified by the Responsible Official, and if necessary, by a Professional Engineer licensed in Louisiana. *Please Note:* New or additional equipment, processes or operating conditions not addressed in the original permit application will be addressed on a case-by-case basis. The Department reserves the right to address such changes in a separate permit action.

**DEQ Response** – **DO NOT COMPLETE THIS SECTION**. This section will be completed by Air Permits Division of DEQ, included in the proposed permit package and made available for public review during any required public comment period.

- Additional rows may be added as necessary.
- Completed Form shall be emailed to the Permit writer in MS Word compatible format within the deadline specified in the email notification.

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Statement of Basis, Section II (Page 2)	A description of the West Site Loading emission sources is not included in section II of the draft permit. This comment is due to an omission in the draft permit. A description of West Site Loading emission sources can be found on page 1-3 of the April 2007 permit application. This comment is due to an omission in the draft permit.	The description for the loading is in the proposed section
Statement of Basis, Section III (Page 3)	The reference to the AERMOD dispersion model is incorrect. Compliance with the Ambient Air Standards was demonstrated by the ISC3 dispersion model. This comment is due to an error in the draft permit.	The Statement of Basis is revised
Air Permit Briefing Sheet, Section III (Page 2)	Revise the first sentence in the third paragraph to include rail car loading facilities. This comment is due to an omission in the draft permit.	The description for the loading is listed in the seventh paragraph
Air Permit Briefing Sheet, Section VII (Page 3)	The reference to the AERMOD dispersion model is incorrect. Compliance with the Ambient Air Standards was demonstrated by the ISC3 dispersion model. This comment is due to an error in the draft permit.	The draft permit is revised
Air Permit Briefing Sheet, Section X (Page	EQ1002 is represented by a "1" for LAC 33:III,Chapter 11. This regulation was not represented in the April 2007 permit application as	The incinerator is subject to LAC 33:III,Chapter 11

Permit Reference	Remarks	Air Permits Division Response (for official use only)
5)	<p>applicable to this source as the FT701 stack exhaust meets nonapplicability standard at LAC 33:III.1111.C. (saturated steam plume). Please remove the "1" representation, which is consistent with the 2889-V0 permit. This comment is due to an error in the draft permit.</p>	
Air Permit Briefing Sheet, Section X (Page 5)	<p>EQT002 is represented by a "1" for LAC 33:III.Chapter 13. This regulation was not represented in the April 2007 permit application as applicable to this source as proposed PM limits are below LAC 33:III.1321 calculated emission rates; therefore, the source is eligible for exemption from the opacity standard at LAC 33:III.1311.E. Please change LAC 33:III.Chapter 13 to a "2" representation for EQT002, which is consistent with the 2889-V0 permit. This comment is due to an error in the draft permit.</p>	LAC 33:III.Chapter 13 does not list any PM standards for the incinerator
Air Permit Briefing Sheet, Section X (Page 5)	<p>EQT016 is represented by a "1" for LAC 33:III.Chapter 13. This regulation was not represented in the April 2007 permit application as applicable to this source as this regulation is not traditionally applied to diesel engines (due to overlap with Chapter 11). The opacity provisions of LAC 33:III.1101.B make the provisions of LAC 33:III.1311.C duplicative. Note also that this source does not meet applicability criteria of LAC 33:III.1313.B (primary purpose of fuel burning is not the production of steam, hot water, hot air). Please remove the LAC 33:III.Chapter 13 "1" representation for EQT016. This comment is due to remove a duplicative requirement in the draft permit.</p>	LAC 33:III.Chapter 13 does not list any PM standards for the engine
Air Permit Briefing Sheet, Section XI (Page 9)	<p>LAC 33:III.Chapter 11 should be identified as a "Does Not Apply" regulation for EQT002 in Section XI. This comment is included for completeness.</p>	The incinerator is subject to LAC 33:III.Chapter 11
Air Permit Briefing Sheet, Section XI (Page 9)	<p>LAC 33:III.1311.C should be identified as an "Exempt" regulation for EQT002 in Section XI, which is consistent with the 2889-V0 permit and the April 2007 permit application. This comment is included for completeness.</p>	LAC 33:III.Chapter 13 does not list any PM standards for the incinerator
Air Permit Briefing Sheet, Section XI (Page 9)	<p>NSPS Subpart IIII should be identified as a "Does Not Apply" regulation for EQT016 in Section XI. This comment is included for completeness.</p>	The draft permit is revised
Air Permit Briefing Sheet, Section XI (Page 9)	<p>NESHAP Subpart GGGG should be identified as an "Exempt" regulation for the entire West Site Facilities (not just EQT002 - Biosolids Incinerator) as represented currently in the draft permit. This comment is due to an error in the draft permit.</p>	The draft permit is revised
Specific Requirements - CRG0001 (Pages 1 and 2)	<p>Replace Requirements 1 - 16 with the following TEMPO language "Shall comply with all the applicable requirements by managing and treating in accordance with BQ6 program. Shall monitor operations and install controls where necessary. Keep records and submit reports as required. Subpart FF. [40 CFR 61.342(e)]." This comment is included for consistency with the April 2007 permit application and the 2889-V0 permit.</p>	The requirement is listed under UNF003
Specific Requirements - CRG0002 (Pages 2 and 3)	<p>Replace Requirements 20 - 35 with the following TEMPO language "Shall comply with all the applicable requirements by managing and treating in accordance with BQ6 program. Shall monitor operations and install controls where necessary. Keep records and submit reports as required. Subpart FF. [40 CFR 61.342(e)]." This</p>	The requirement is listed under UNF003

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Specific Requirements - EQT002 (Page 3 - 5)	comment is included for consistency with the April 2007 permit application and the 2889-V0 permit. Remove Requirements 37- 66. These requirements are associated with NSPS Subpart DDDD for Commercial and Industrial Solid Waste Incineration Units, which was vacated by the DC Circuit Court of Appeals on June 8, 2007. This comment is due to an error in the draft permit.	The draft permit is revised
Specific Requirements - EQT002 (Page 5)	Remove Requirement 69. LAC 33:III.1101.B does not apply as the FT701 stack exhaust meets the nonapplicability standard at LAC 33:III.1111.C. (saturated steam plume). This comment is due to an error in the draft permit.	The incinerator is subject to LAC 33:III.Chapter II
Specific Requirements - EQT002 (Page 5)	Remove Requirement 70. LAC 33:III.1311.C was not represented in the April 2007 permit application as applicable to this source as proposed PM limits are below LAC 33:III.1321 calculated emission rates; therefore, the source is eligible for the exemption from the opacity standard at LAC 33:III.1311.E. This comment is due to an error in the draft permit.	LAC 33:III.Chapter 13 does not list any PM standards for the incinerator
Specific Requirements - EQT002 (Page 5)	Remove Requirements 72 - 77. The regulatory citation for the referenced requirements is LAC 33:III.2670; however, no such regulation currently exists. This comment is due to an error in the draft permit.	The draft permit is revised
Specific Requirements - EQT002 (Page 5)	Revise Requirement 78. As NSPS Subpart DDDD has been vacated by the DC Circuit Court of Appeals, it should not be referenced in the MACT determination. Revise this requirement as follows: "Shall utilize a direct flame afterburner, packed scrubber, eductor scrubber, and wet electrostatic precipitator (ESP) to control TAP emissions - Determined as MACT." This comment is due to an error in the draft permit.	The draft permit is revised
Specific Requirements - EQT012 (Page 6)	Replace Requirements 82 - 88 with the following TEMPO language "Shall comply with all the applicable requirements by managing and treating in accordance with BQ6 program. Shall monitor operations and install controls where necessary. Keep records and submit reports as required. Subpart FF. [40 CFR 61.342(3)]." This comment is included for consistency with the April 2007 permit application.	The requirement is listed under UNF003
Specific Requirements - EQT016 (Page 6)	Remove Requirement 91. LAC 33:III.1311.C was not represented in the April 2007 permit application as applicable to this source as this regulation is not traditionally applied to diesel engines (due to overlap with Chapter 11). The opacity provisions of LAC 33:III.1101.B make the provisions of LAC 33:III.1311.C duplicative. Note also that this source does not meet applicability criteria of 1313.B (primary purpose of fuel burning is not the production of steam, hot water, hot air). This comment is due to the inclusion of a duplicative requirement in the draft permit.	LAC 33:III.Chapter 13 does not list any PM standards for the engine

### Worksheet for Technical Review of Working Draft of Proposed Permit

<b>Company Name:</b>	Shell Chemical LP	<b>AI #:</b>	4384	<b>TEMPO Activity No:</b>	PER20070002
<b>Facility Name:</b>	Norco Chemical Plant – West Site	<b>Remarks Submitted by:</b>	May 22, 2007		
<b>Permit Writer:</b>	DAN NGUYEN	<b>Permit Writer Email address:</b>	DAN.NGUYEN@LA.GOV		

#### Instructions

**Permit Reference** – Indicate specific portion(s) of the permit to which the remark relates (i.e. “Specific Condition 120”, or “Section II Air Permits Briefing Sheet”, etc.).

**Remarks** – Explain the basis for each remark. Provide regulatory citations where possible. If the remark is made due to an error or omission in the permit application this must be noted and the revised information *must be submitted*. Revised information may be submitted separately from this worksheet. Please be aware that revised information must be submitted in writing and certified by the Responsible Official, and if necessary, by a Professional Engineer licensed in Louisiana. *Please Note:* New or additional equipment, processes or operating conditions not addressed in the original permit application will be addressed on a case-by-case basis. The Department reserves the right to address such changes in a separate permit action.

**DEQ Response – DO NOT COMPLETE THIS SECTION.** This section will be completed by Air Permits Division of DEQ, included in the proposed permit package and made available for public review during any required public comment period.

- Additional rows may be added as necessary.
- Completed Form shall be emailed to the Permit writer in MS Word compatible format within the deadline specified in the email notification.

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Statement of Basis, Section II (Pages 1 and 2)	Resolution Performance Products, LLC should be changed to Hexion Specialty Chemicals Inc. This comment is due to carry-over from the 2889-V0 permit.	The Statement of Basis is revised
Statement of Basis, Section II (Page 2)	A description of the West Site Loading emission sources is not included in section II of the draft permit. This comment is due to an omission in the draft permit. A description of West Site Loading emission sources can be found on page I-3 of the April 2007 permit application.	The description for the loading is in the proposed section
Statement of Basis, Section III, Permitted Air Emissions (Page 3)	Revise "Permitted" column emission rate for "VOC, Total" from 130.14 to 169.73 and the "Change" column emission rate for "VOC, Total" from +34.23 to -5.36. This comment is due to an error in the draft permit.	The Statement of Basis is revised
Statement of Basis, Section III, Air Modeling Analysis (Pages 3 and 4)	Shell is only proposing to model three pollutants with this application, Chlorinated Dibenzofuran, Chlorinated Dibenzofuran, and Hydrochloric Acid. As such, all other pollutants that are not being modeled in support of this application should be removed. This comment is due to a carry-over from the 2889-V0 permit.	The Statement of Basis is revised
Statement of Basis, Section VI (Page 5)	NSPS Subpart IIII should be identified as a "Does Not Apply" regulation for EQT016 in Section VI. This comment is included for completeness.	The Statement of Basis is revised
Statement of Basis, Section VI (Page 5)	LAC 33:III Chapter 11 should be identified as a "Does Not Apply" regulation for EQT002 in Section VI. This comment is included for completeness.	The Statement of Basis is revised

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Statement of Basis, Section VI (Page 5)	LAC 33:III.1311.C should be identified as an "Exempt" regulation for EQT002 in Section VI, which is consistent with the 2889-V0 permit and the April 2007 permit application. This comment is included for completeness.	LAC 33:III.Chapter 13 does not list any PM standards for the incinerator
Statement of Basis, Section VI (Page 5)	NESHAP Subpart GGGGG should be identified as an "Exempt" regulation for the entire West Site Facilities (not just EQT002 - Biosolids Incinerator) as represented currently in the draft permit. This comment is due to an error in the draft permit.	The Statement of Basis is revised
Air Permit Briefing Sheet, Section III (Pages 1 and 2)	Resolution Performance Products, LLC should be changed to Hexion Specialty Chemicals Inc. This comment is due to carry-over from the 2889-V0 permit.	The draft permit is revised
Air Permit Briefing Sheet, Section III (Page 1)	Combine the first two sentences in Section I (Background) to read as follows: " The Norco Chemical Plant - West Site consists of the T-Unit, which currently operates under permit 2889-V0, dated August 31, 2004 and butylene storage spheres and the West Site loading operations, which currently operates under Permit 2831-V0, dated March 21, 2003." This comment is included to further clarify the background section of the draft permit.	The draft permit is revised
Air Permit Briefing Sheet, Section III (Page 2)	Please replace language in the first sentence in Section III (Description) to read as follows: "... and introduced at various locations in the Effluent Biotreater System". This comment is included to further clarify the description section of the draft permit.	The draft permit is revised
Air Permit Briefing Sheet, Section III, (Page 2)	Revise "Permitted" column emission rate for "VOC, Total" from 130.14 to 169.73 and the "Change" column emission rate for "VOC, Total" from +34.23 to -5.36. This comment is due to an error in the draft permit.	The draft permit is revised
Air Permit Briefing Sheet, Section VII, (Pages 3 and 4)	Shell is only proposing to model three pollutants with this application, Chlorinated Dibenzof-P-Dioxins, Chlorinated Dibenzofurans, and Hydrochloric Acid. As such, all other pollutants that are not being modeled in support of this application should be removed. This comment is due to an error in the draft permit.	The draft permit is revised
Air Permit Briefing Sheet, Section VII (Page 4)	Emissions for GC XVII Activity - Tank T-1251 T/A was represented as ~ 28 lb/yr in the April 2007 permit application, which is greater than the "<0.01" tpy value in the draft permit. Revise the estimated emissions value to 0.01 tpy. This comment is due to an error in the draft permit.	The draft permit is revised
Air Permit Briefing Sheet, Section IX (Page 4)	The Insignificant Activity - Temporary IC Engines for Maintenance Activities was not included in the April 2007 permit application as they were recategorized as described in Section II of the April 2007 permit application and should be removed from the permit. This comment is due to a carry-over from the 2889-V0 permit.	The draft permit is revised
Air Permit Briefing Sheet, Section IX (Pages 4 and 5)	Type B and C Insignificant Activities are identified in the draft permit. Note that Type B and C activities were not included in the April 2007 permit application and are not required to be identified in permits per LAC 33:III.501.B.5 (Tables B and C). Please remove insignificant Activities with B or C citations. This comment is due to carry-over from the 2889-V0 permit.	The draft permit is revised
Air Permit Briefing Sheet, Section X (Page 6)	EQT002 is represented by a "1" for LAC 33:III.Chapter 11. This regulation was not represented in the April 2007 permit application as applicable to this source as the FT701 stack exhaust meets nonapplicability standard at LAC 33:III.1111.C. (saturated steam plume). Please remove the "1" representation, which is consistent with the 2889-V0 permit. This comment is due to an error in the draft permit.	The draft permit is revised
Air Permit Briefing Sheet, Section X (Page 6)	EQT016 is represented by a "1" for LAC 33:III.Chapter 13. This regulation was not represented in the April 2007 permit application as applicable to this source as this regulation is not traditionally applied to diesel engines (due to overlap with Chapter 11). The opacity provisions of LAC 33:III.1101.B make the provisions of LAC 33:III.1311.C duplicative. Note also that this source does not meet applicability criteria of LAC 33:III.1313.B (primary purpose of fuel burning is not the production of steam, hot water, hot air). Please remove the LAC 33:III.Chapter 13 "1" representation for EQT016. This comment is due to remove a duplicative requirement in the draft permit.	The draft permit is revised
Air Permit Briefing Sheet, Section X (Page 6)	EQT002 is represented by a "1" for LAC 33:III.Chapter 13. This regulation was not represented in the April 2007 permit application as applicable to this source as proposed PM limits are below LAC 33:III.1321 calculated emission rates; therefore, the source is eligible for exemption from the opacity standard at LAC 33:III.1311.E. Please change LAC 33:III.Chapter 13 to a "2" representation for EQT002, which is consistent with the 2889-V0 permit. This comment is due to an error in the draft permit.	The draft permit is revised

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Air Permit Briefing Sheet, Section X (Page 10)	NSPS Subpart IIII should be identified as a "Does Not Apply" regulation for EQT016 in Section X. This comment is included for completeness.	The draft permit is revised
Air Permit Briefing Sheet, Section XI (Page 10)	LAC 33:III.Chapter 11 should be identified as a "Does Not Apply" regulation for EQT002 in Section X. This comment is included for completeness.	The incinerator is subject to LAC 33:III.Chapter II
Air Permit Briefing Sheet, Section XI (Page 10)	LAC 33:III.1311.C should be identified as an "Exempt" regulation for EQT002 in Section X, which is consistent with the 2889-V0 permit and the April 2007 permit application. This comment is included for completeness.	LAC 33:III.Chapter 13 does not list any PM standards for the incinerator
Air Permit Briefing Sheet, Section XI (Page 10)	NESHAP Subpart GGGGG should be identified as an "Exempt" regulation for the entire West Site Facilities (not just EQT002 - Biosolids Incinerator) as represented currently in the draft permit. This comment is due to an error in the draft permit.	The draft permit is revised
Air Permit Briefing Sheet, Section XI (Page 10)	Revise EQT002 and 016 ID Nos. in Section XI to be consistent with other representations throughout the draft permit (EQT 2 revised to EQT002, EQT 16 revised to EQT016). This comment is included for consistency.	The draft permit is revised
Inventories, Subject Item Inventory, (Page 1)	Remove the listed "Normal Operating Rate" of 245 gallons/min for EQT015 (236-11 - T-1101 Open) since this value is a carry-over from the 2889-V0 permit and is not consistent with the emissions system approach proposed with the April 2007 permit application. This comment is due to a carry-over from the 2889-V0 permit.	The draft permit is revised
Inventories, Subject Item Inventory, (Page 1)	Revise the "Operating Time" for EQT016 (223-Biotreater Effluent Backup Pump Diesel Engine (DP- T206)) from 1248 hr/yr to 1564 hr/yr. This comment is due to an error in the draft permit.	The draft permit is revised
Inventories, Subject Item Groups, (Pages 1 and 2)	Add "FUG003 142-Area Fugitive Emissions West Site C3/C4 Systems" to the list for GRP006 Norco Chemical Plant - West Site Facilities. This comment is due to an error in the draft permit.	The draft permit is revised
Emission Rates For Criteria Pollutants, Emission Rate Notes, (Page 1)	Remove EQT002 emission rate notes "(at 7% O2, dry, STP)". This note is a carry-over from the 2889-V0 permit that is no longer appropriate due to the revised emission calculation methodologies for the Biosolids Incinerator (EQT002). This comment is due to carry-over from the 2889-V0 permit.	The draft permit is revised
Emission Rates For TAP/HAP & Other Pollutants, (Page 6)	Revise Epichlorohydrin Tons/Year emission rate for EQT 026 from "4.01" to "4.81". This comment is due to an error in the draft permit.	The draft permit is revised
Emission Rates For TAP/HAP & Other Pollutants, (Page 10)	Add emissions of Cobalt compounds to EQT 002. This comment is due to an omission in the draft permit.	The draft permit is revised
Emission Rates For TAP/HAP & Other Pollutants, Permit Parameter Totals, (Page 11)	Revise total emissions of Epichlorohydrin from "4.01 tons/yr" to "4.81 tons/yr". This comment is due to an error in the draft permit.	The draft permit is revised
Emission Rates For TAP/HAP & Other Pollutants, Permit Parameter Totals, (Page 11)	Add total emissions for Chromium, Cobalt, and Lead. This comment is due to an omission in the draft permit.	The draft permit is revised
Emission Rates For TAP/HAP & Other Pollutants, Emission Rate Notes, (Pages 11 and 12)	Remove EQT002 emission rate notes "(at 7% O2, dry, STP)". This note is a carry-over from the 2889-V0 permit that is no longer appropriate due to the revised emission calculation methodologies for the Biosolids Incinerator (EQT002). This comment is due to carry-over from the 2889-V0 permit.	The draft permit is revised
Specific Requirements - ARE007 (Page 1)	Replace Requirements 2 - 17 with the following TEMPO language "Shall comply with all the applicable requirements by managing and treating in accordance with BQ6 program. Shall monitor operations and install controls where necessary. Keep records and submit reports as required. Subpart FF, [40 CFR 61.342(3)]." This comment is included for consistency with the April 2007 permit application.	The draft permit is revised

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Specific Requirements - EQT002 (Page 2)	Remove Requirement 20. LAC 33:III.1101.B does not apply as the FT701 stack exhaust meets the nonapplicability standard at LAC 33:III.111.C. (saturated steam plume). This comment is due to an error in the draft permit.	The draft permit is revised
Specific Requirements - EQT002 (Page 2)	Remove Requirement 21. LAC 33:III.1311.C was not represented in the April 2007 permit application as applicable to this source as proposed PM limits are below LAC 33:III.1321 calculated emission rates; therefore, the source is eligible for the exemption from the opacity standard at LAC 33:III.1311.E. This comment is due to an error in the draft permit.	The draft permit is revised
Specific Requirements - EQT002	Please replace language in Requirement 24 to read as follows: "... measured during the 2002 Biosolids Incinerator stack test." As described in the July 17, 2006 submittal of the Test Report for the Biosolids Incinerator Initial Performance Test to the LDEQ, ambient air leakage due to crack's in the incinerator's shell and ductwork resulted in elevated oxygen levels during the Initial Performance Test. As such, Shell proposed to utilize the 2002 Biosolids Incinerator stack test to establish the appropriate Afterburner Flue Gas Oxygen level. The LDEQ approved the Site Specific Operating Limits on Afterburner Flue Gas Oxygen for the Biosolids Incinerator on 9/28/06 based on the 2002 Biosolids Incinerator stack test. This comment is due to an error in the draft permit.	The draft permit is revised
Specific Requirements - EQT002 (Page 3)	Remove Requirements 45 - 47. As described in correspondence to LDEQ on 5/12/06, the inlet gases are saturated upstream when passing through the scrubber; thereby, negating the need to operate the WESP water mister system. The Initial Performance Test was conducted without the WESP water mister system and demonstrated compliance with NSPS Subpart DDDD. Thus, monitoring of this parameter for purpose of demonstrating compliance with Louisiana's State CISWI Plan is no longer applicable. Note also that the LDEQ approved the Initial Performance Test on 9/28/06 (which did not include operation of the WESP water mister system). This comment is due to an error in the draft permit.	The draft permit is revised
Specific Requirements - EQT003 (Page 4)	Remove Requirement 67. Monitoring of pressure drop is not required under LAC 33:III.1305. This comment is due to an error in the draft permit.	The draft permit is revised
Specific Requirements - EQT004 (Pages 4 and 5)	Replace Requirements 70 - 85 with the following TEMPO language "Shall comply with all the applicable requirements by managing and treating in accordance with BQ6 program. Shall monitor operations and install controls where necessary. Keep records and submit reports as required. Subpart FF. [40 CFR 61.342(3)]." This comment is included for consistency with the April 2007 permit application.	The requirement is listed under UNF003
Specific Requirements - EQT005 (Pages 5 and 6)	Replace Requirements 87 - 102 with the following TEMPO language "Shall comply with all the applicable requirements by managing and treating in accordance with BQ6 program. Shall monitor operations and install controls where necessary. Keep records and submit reports as required. Subpart FF. [40 CFR 61.342(3)]." This comment is included for consistency with the April 2007 permit application.	The requirement is listed under UNF003
Specific Requirements - EQT006 (Pages 6 and 7)	Replace Requirements 104 - 119 with the following TEMPO language "Shall comply with all the applicable requirements by managing and treating in accordance with BQ6 program. Shall monitor operations and install controls where necessary. Keep records and submit reports as required. Subpart FF. [40 CFR 61.342(3)]." This comment is included for consistency with the April 2007 permit application.	The requirement is listed under UNF003
Specific Requirements - EQT007 (Pages 7 and 8)	Replace Requirements 121 - 136 with the following TEMPO language "Shall comply with all the applicable requirements by managing and treating in accordance with BQ6 program. Shall monitor operations and install controls where necessary. Keep records and submit reports as required. Subpart FF. [40 CFR 61.342(3)]." This comment is included for consistency with the April 2007 permit application.	The requirement is listed under UNF003
Specific Requirements - EQT008 (Pages 8 and 9)	Replace Requirements 138 - 153 with the following TEMPO language "Shall comply with all the applicable requirements by managing and treating in accordance with BQ6 program. Shall monitor operations and install controls where necessary. Keep records and submit reports as required. Subpart FF. [40 CFR 61.342(3)]." This comment is included for consistency with the April 2007 permit application.	The requirement is listed under UNF003
Specific Requirements - EQT009 (Pages 9 and 10)	Replace Requirements 155 - 170 with the following TEMPO language "Shall comply with all the applicable requirements by managing and treating in accordance with BQ6 program. Shall monitor operations and install controls where necessary. Keep records and submit reports as required. Subpart FF. [40 CFR 61.342(3)]." This comment is included for consistency with the April 2007 permit application.	The requirement is listed under UNF003

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Specific Requirements - EQT010 (Page 11)	Replace Requirements 174 - 189 with the following TEMPO language "Shall comply with all the applicable requirements by managing and treating in accordance with BQ6 program. Shall monitor operations and install controls where necessary. Keep records and submit reports as required. Subpart FF. [40 CFR 61.342(3)]." This comment is included for consistency with the April 2007 permit application.	The requirement is listed under UNF003
Specific Requirements - EQT011 (Pages 12 and 13)	Replace Requirements 193 - 208 with the following TEMPO language "Shall comply with all the applicable requirements by managing and treating in accordance with BQ6 program. Shall monitor operations and install controls where necessary. Keep records and submit reports as required. Subpart FF. [40 CFR 61.342(3)]." This comment is included for consistency with the April 2007 permit application.	The requirement is listed under UNF003
Specific Requirements - EQT012 (Page 13)	Replace Requirements 212 - 218 with the following TEMPO language "Shall comply with all the applicable requirements by managing and treating in accordance with BQ6 program. Shall monitor operations and install controls where necessary. Keep records and submit reports as required. Subpart FF. [40 CFR 61.342(3)]." This comment is included for consistency with the April 2007 permit application.	The requirement is listed under UNF003
Specific Requirements - EQT013 (Pages 13 and 14)	Replace Requirements 220 - 235 with the following TEMPO language "Shall comply with all the applicable requirements by managing and treating in accordance with BQ6 program. Shall monitor operations and install controls where necessary. Keep records and submit reports as required. Subpart FF. [40 CFR 61.342(3)]." This comment is included for consistency with the April 2007 permit application.	The requirement is listed under UNF003
Specific Requirements - EQT014 (Pages 14 and 15)	Replace Requirements 237 - 252 with the following TEMPO language "Shall comply with all the applicable requirements by managing and treating in accordance with BQ6 program. Shall monitor operations and install controls where necessary. Keep records and submit reports as required. Subpart FF. [40 CFR 61.342(3)]." This comment is included for consistency with the April 2007 permit application.	The requirement is listed under UNF003
Specific Requirements - EQT015 (Pages 15 and 16)	Replace Requirements 254 - 269 with the following TEMPO language "Shall comply with all the applicable requirements by managing and treating in accordance with BQ6 program. Shall monitor operations and install controls where necessary. Keep records and submit reports as required. Subpart FF. [40 CFR 61.342(3)]." This comment is included for consistency with the April 2007 permit application.	The requirement is listed under UNF003
Specific Requirements - EQT016 (Page 17)	Remove Requirement 271. LAC 33:III.1311.C was not represented in the April 2007 permit application as applicable to this source as this regulation is not traditionally applied to diesel engines (due to overlap with Chapter 11). The opacity provisions of LAC 33:III.101.B make the provisions of LAC 33:III.1311.C duplicative. Note also that this source does not meet applicability criteria of 1313.B (primary purpose of fuel burning is not the production of steam, hot water, hot air). This comment is due to the inclusion of a duplicative requirement in the draft permit.	The draft permit is revised
Specific Requirements - EQT017 (Pages 17 and 18)	Replace Requirements 274 - 289 with the following TEMPO language "Shall comply with all the applicable requirements by managing and treating in accordance with BQ6 program. Shall monitor operations and install controls where necessary. Keep records and submit reports as required. Subpart FF. [40 CFR 61.342(3)]." This comment is due to an error in the draft permit.	The requirement is listed under UNF003
Specific Requirements - EQT018 (Pages 18 and 19)	Replace Requirements 291 - 306 with the following TEMPO language "Shall comply with all the applicable requirements by managing and treating in accordance with BQ6 program. Shall monitor operations and install controls where necessary. Keep records and submit reports as required. Subpart FF. [40 CFR 61.342(3)]." This comment is due to an error in the draft permit.	The requirement is listed under UNF003
Specific Requirements - EQT019 (Pages 19 and 20)	Replace Requirements 308 - 320 with the following TEMPO language "Shall comply with all the applicable requirements by managing and treating in accordance with BQ6 program. Shall monitor operations and install controls where necessary. Keep records and submit reports as required. Subpart FF. [40 CFR 61.342(3)]." This comment is due to an error in the draft permit.	The requirement is listed under UNF003
Specific Requirements, GRP006 (Pages 20 - 23)	Remove Specific Requirement 348 as this requirement is in units of "lb/hr" and is not consistent with all other similar specific requirements. This comment is due to a request for consistency.	The draft permit is revised
Specific Requirements, GRP006 (Pages 20 - 23)	Revise Specific Requirement 354, Epichlorohydrin emissions, from "4.01 tons/yr" to "4.81 tons/yr". This comment is due to an error in the draft permit.	The draft permit is revised
Specific Requirements, GRP006 (Pages 20 - 23)	Add Specific Requirement annual emission rates for pollutants, chromium and Cobalt. This comment is due to an omission in the draft permit.	The draft permit is revised